

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

DYLAN MATTHEW DELING,  
A/K/A "JASON KEENS,"  
A/K/A "DYLAN NASH,"

Defendant.

INDICTMENT

CR 19-41 WMW /SER

18 U.S.C. § 875(b)  
18 U.S.C. § 981(a)(1)(C)  
18 U.S.C. § 2251(a)  
18 U.S.C. § 2251(e)  
18 U.S.C. § 2253(a)  
18 U.S.C. § 2253(b)  
18 U.S.C. § 2260A  
21 U.S.C. § 853(p)  
28 U.S.C. § 2461(c)

THE UNITED STATES GRAND JURY CHARGES THAT:

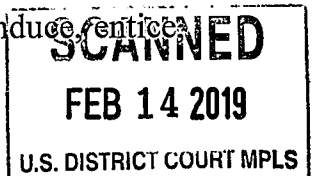
**COUNT 1**

**(Production and Attempted Production of Child Pornography)**

On or about May 14, 2018, in the State and District of Minnesota and elsewhere,  
the defendant,

**DYLAN MATTHEW DELING,  
A/K/A "JASON KEENS,"  
A/K/A "DYLAN NASH,"**

having been convicted previously under the laws of the State of Minnesota relating to the  
possession of child pornography, namely a conviction on or about March 27, 2018, in  
Nicollet County, Minnesota, attempted to and did employ, use, persuade, induce, entice,



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and coerce Minor A, whose identity is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 2**

**(Commission of a Felony Offense by a Registered Sex Offender)**

On or about May 14, 2018, in the State and District of Minnesota, the defendant,

**DYLAN MATTHEW DELING,  
A/K/A "JASON KEENS,"  
A/K/A "DYLAN NASH,"**

an individual required by Minnesota law to register as a sex offender, committed a felony offense involving a minor under Title 18, United States Code, Section 2251, as charged in Count 1, all in violation of Title 18, United States Code, Section 2260A.

**COUNT 3**

**(Interstate Communication with Intent to Extort)**

On or about July 8, 2018, in the State and District of Minnesota and elsewhere, the defendant,

**DYLAN MATTHEW DELING,  
A/K/A "JASON KEENS,"  
A/K/A "DYLAN NASH,"**

knowingly and with intent to extort a thing of value from Minor B, whose identity is known to the grand jury, did transmit in interstate and foreign commerce a communication that contained a threat to kidnap Minor B and to injure the person of another, specifically Minor

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B and her parents, whose identities are known to the grand jury, all in violation of Title 18, United States Code, Section 875(b).

**FORFEITURE ALLEGATIONS**

Counts 1 and 3 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 2253(a), and Title 28, United States Code, Section 2461(c).

If convicted of Count 1 of the Indictment, the Defendant,

**DYLAN MATTHEW DELING,  
A/K/A "JASON KEENS,"  
A/K/A "DYLAN NASH,"**

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

1. any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18, United States Code;
2. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
3. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including but not limited to: an Apple iPhone 6, serial number FFPV83MJHYFK.

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If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

If convicted of Count 3 of the Indictment, the Defendant,

**DYLAN MATTHEW DELING,  
A/K/A "JASON KEENS,"  
A/K/A "DYLAN NASH,"**

shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation of Title 18, United States Code, Section 875.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All in violation of Title 18, United States Code, Sections 875(d), 981(a)(1)(C), 2252(a)(2), 2252(a)(4)(B), and 2253(a) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON